

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT V-08-015 R1

Comments on Equitable Gathering LLC, Dwale Draft Title V Air Quality Permit were submitted by Jennifer Osborne, Environmental Coordinator for Kentucky and Virginia Equitable Resources and Gaurav Shil of Trinity Consultants.

Draft Permit

1. Emission Group 02; page 6 of 23

The facility requests to change the frequency of visible emissions monitoring from weekly to monthly as the flare is used control organic emissions from the glycol dehydration unit and the PTE for PM emissions is low.

Division's response: Comment acknowledged, changes made in Sections 4(a) and 5(a). If visible emissions are observed, an EPA Reference Method 22 test shall be performed.

2. Emission Group 02; Section 3 (c); page 6 of 23

Annual flare compliance assessment requirements (to determine max. velocity and net heating value) are included. First testing is required within 180 days of permit issuance. 60.18 applicability is questionable because no applicable Part 60 or 61 standard references 60.18. Moreover, the flare design will not change or the flare will not be modified every year; therefore, annual testing may not be required.

Division's response: Flare design will not change or be modified every year, however improper maintenance of the flare would result in changes in maximum velocity or net heating value. Hence annual compliance assessment required.

3. Emission Group 02; Sections 4 (a) and 4 (b); page 6 of 23

Change the reference in Conditions 4.a and 4.b from 401 KAR 52:030 (for FESOP permits) to 401 KAR 52:020 (for Title V permits) because the Dwale Station is a Title V source.

Division's response: Comment acknowledged, changes made.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.